IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States District Court
Southern District of Texas
FILED
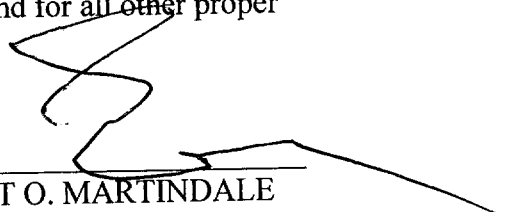
MAY 2 9 2012

David J. Bra....y, Clerk of Court

MILLENNIUM TGA, INC.	)	CASE NO.: 4:11-cv-4501
	)	
PLAINTIFF	)	JUDGE:
v.	)	
	)	
JOHN DOE,	)	MAGISTRATE JUDGE:
	)	
DEFENDANT	)	

MOTION TO QUASH OR VACATE SUBPOENA

COMES now, John Doe, Defendant Little Rock, Arkansas, one of the persons whose private information has been subpoenaed by Plaintiff from Comcast, requests that the subpoena as it applies to and affects him, be quashed and vacated for the following reasons:

1.   Plaintiff is guilty of forum shopping having filed identical lawsuits in the District of Columbia and in the Southern District of Texas.

2.   This John Doe resides in the State of Arkansas and Plaintiff has no personal jurisdiction whatsoever over this Defendant.

3.   The Order upholding the subpoena in the Southern District of Texas is under appeal and there are several valid basis for that appeal. It is expected that the Order upholding the subpoena will be overturned.

4.   This John Doe has not engaged in any activity as alleged in Plaintiff's Complaint and has a valid defense to any such allegations on the part of Plaintiff.

WHEREFORE, John Doe, from Little Rock, Arkansas requests that the subpoena

for any of his records from Comcast be quashed and vacated and for all other proper

relief including appropriate attorney fees.

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Defendant Little Rock, Arkansas
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CERTIFICATE OF SERVICE

On this the 25th day of May, 2012, a true and correct copy of this pleading was
sent via United States Mail with proper postage affixed thereon to:

Prenda Law Firm
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